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ASB Comments from Don Closter
Property/Casualty Ratemaking Exposure Draft
September 2014

Page 1 & 2, Items 1.2 & 2.7

The first sentence ends with: "... for policies not yet written." This phrase suggests the standard applies only to pure new business and should be removed. The standard applies to ratemaking for all policies whether currently on the insurers books or to be acquired in the future. Perhaps the intent was that this standard applies under prospective rating, in which case it should be reworded to say that.

Page 3, Item 3.4

The end of the last sentence states: "... are not internally inconsistent." I believe the intention was for this sentence to say: "... and are internally consistent."

Page 3, Item 3.5 paragraph 2

In the second sentence it says: "... it is often appropriate...". I believe that phrase should be changed to: "... it may be appropriate...".